

EXHIBIT A

MAR 13 2015

John Daubert
422 Berwick Street
White Haven, PA 18661

Plaintiff

v.

Court of Common Pleas of Luzerne County
– Civil Action

NRA Group, LLC
d/b/a National Recovery Agency
2491 Paxton Street
Harrisburg, PA 17111

Defendant

Jury Trial Demanded

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claim set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED RATE OR NO FEE.

AVISO

A USTED SE LE HA DEMANDADO EN LA CORTE. Si usted quiere defenderse contra la demanda expuesta en las siguientes páginas, tiene que tomar acción en un plazo de veinte (20) días después que reciba esta demanda y aviso, por presentar una notificación de comparecencia escrita personalmente o por un abogado y radicar por escrito en la Corte sus defensas u objeciones a las demandas presentadas en su contra. Se le advierte que si falla en hacerlo, el caso podría seguir adelante sin usted y un fallo podría ser dictado en su contra por la Corte sin previo aviso por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio pedido por el/la demandante. Puede que usted pierda dinero o propiedad u otros derechos importantes para usted. USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO, DIRÍJASE O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ABAJO. ESTA OFICINA PUEDE PROVEERLE CON INFORMACIÓN SOBRE COMO CONTRATAR UN ABOGADO.

SI NO TIENE LOS FONDOS SUFICIENTES PARA CONTRATAR UN ABOGADO, ESTA OFICINA PODRÍA PROPORCIONARLE INFORMACIÓN ACERCA DE AGENCIAS QUE PUEDAN OFRECERLES SERVICIOS LEGALES A PERSONAS QUE REÚNAN LOS REQUISITOS A UN HONORARIO REDUCIDO O GRATIS.

North Penn Legal Services, Inc.
33 N. Main Street,
Suite 200
Pittston, PA 18640
(570) 299-4100
(877) 953-4250 Toll free
(570) 824-0001 Fax

101 West Broad Street,
Suite 513
Hazelton, PA 18201
(570) 455-9512
(877) 953-4250 Toll Free
(570) 455-3625 Fax

Servicios Legales de North Penn, Inc.
33 la Calle Main del Norte, Oficina 200
Pittston, PA 18640
(570) 299-4100
(877) 953-4250 Llamada gratuita
(570) 824-0001 Fax

101 la Calle Broad del Oeste,
Oficina 513
Hazelton, PA 18201
(570) 455-9512
(877) 953-4250 Llamada gratuita
(570) 455-3625

John Daubert,		
	Plaintiff	Court of Common Pleas of Luzerne County
v.		- Civil Action
NRA Group, LLC d/b/a National Recovery Agency,		
	Defendant	Jury Trial Demanded

COMPLAINT

I. Introduction

1. This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("the Act") which prohibits debt collectors from engaging in abusive, unfair, and deceptive practices.

II. Jurisdiction

2. Jurisdiction of this Court is proper pursuant to 15 U.S.C. § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction.

3. Venue in this district is proper in that Defendant transacts business here and the conduct complained of is alleged to have occurred here.

III. Parties

4. Plaintiff, John Daubert, is a natural person residing at 422 Berwick Street, White Haven, PA 18661.

5. Defendant, NRA Group, LLC d/b/a National Recovery Agency, ("NRA") is a limited liability corporation engaged in the business of collecting debts in this state with a place of business located at 2491 Paxton Street, Harrisburg, PA 17111 and is a "debt collector" as defined by the Act, 15 U.S.C. § 1692a(6).

IV. Statement of Claim

6. Within the past year NRA was attempting to collect from Plaintiff an alleged account that was identified by a number ending in 100U ("the Account").

7. The Account is a "debt" as that term is defined by the Act, 15 U.S.C. § 1692a(5).

8. NRA regularly uses the mails to attempt to collect debts asserted to be due another.

9. On or about April 9, 2014, NRA caused to be mailed a letter addressed to Plaintiff.

10. A true and correct copy of the letter is attached as Exhibit A. (Redacted to ensure financial privacy.)

11. The letter was an attempt to collect the Account.

12. The letter was mailed in an envelope. The mailing address for the letter was not physically printed on the outside of the envelope, and instead was visible through a glassine window and appeared as follows:

100U/018 201157525837 7737/0003869/0018
|||
John Daubert
422 Berwick St
White Haven, PA 18661-1305

(Redacted for financial privacy). The allegations in this paragraph are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

13. The number by which Defendant identified the Account was included on a line above the mailing address as follows: 100U. (Redacted for financial privacy.)

14. This account number was associated solely with the Account, and was

therefore personal identifying information related to Plaintiff.

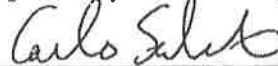
15. By disclosing Plaintiff's sensitive financial information on an envelope sent through the U.S. mail, Defendant increased the risk that Plaintiff would be a victim of identity theft.

16. Defendant also violated 15 U.S.C. § 1692f(8) of the Act, which generally prohibits the use of "any language or symbol, other than the debt collector's address, on any envelope when communicating with a consumer by use of the mails"

17. Defendant violated the Act.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, costs, attorney's fees, and such other and further relief as the Court deems just and proper.

Respectfully Submitted,



Carlo Sabatini
Bar Number PA 83831
Attorney for Plaintiff
Sabatini Law Firm, LLC
216 N. Blakely St.
Dunmore, PA 18512
Phone (570) 341-9000

Verification by Plaintiff John Daubert

I affirm that the averments of fact contained in this pleading are true upon my personal knowledge or information and belief.



John Daubert

Exhibit A

(Letter dated April 9, 2014)

NATIONAL RECOVERY AGENCY2491 Paxton Street, Harrisburg PA 17111
Toll Free: (800) 360-4319John Daubert
422 Berwick St
White Haven, PA 18661-1305PIN #: 1254
NRA ID: 100U
TOTAL DUE: \$25.00

Dear John Daubert,

Your account has been forwarded to this office for collections.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Below is a listing of accounts included in the total amount due listed above:

ORIGINAL CREDITOR	ACCOUNT #	DATE	AMOUNT	INTEREST	COSTS	AMT OWED
RADIOLOGY ASSOC OF WYOMING VLY	1481	11/08/13	25.00	.00	.00	25.00


Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Unless you dispute this debt, your payment should be made directly to this office. Please choose one of the following methods of payment. Please note that a service charge of twenty dollars will be added to all checks returned to us by your bank as permitted by law.

NOTICE: SEE REVERSE SIDE FOR IMPORTANT NOTICES AND CONSUMER RIGHTS

PAYMENT OPTIONS

Telephone Hours:



Monday - Thursday 8:00 A.M. to 8:30 P.M.
Friday 8:00 A.M. to 5:00 P.M.
Saturday 8:00 A.M. to 12:30 P.M.
Eastern Standard Time
(800) 360-4319



Send Mail To:

NATIONAL RECOVERY AGENCY
PO BOX 67015
HARRISBURG, PA 17106-7015



Via Internet:

Pay online by credit card
or check at
www.nationalrecovery.com

Calls to or from NATIONAL RECOVERY AGENCY may be recorded or monitored.

To ensure proper credit to your account please detach bottom portion and return it with payment in the enclosed envelope.

PO Box 67015
Harrisburg, PA 17106-7015



Toll Free: (800) 360-4319
Statement Date: April 9, 2014


100U/018 201157525837 7737/0003069/0018



John Daubert
422 Berwick St
White Haven, PA 18661-1305

IF PAYING BY CREDIT CARD, FILL OUT BELOW.		
<input checked="" type="checkbox"/> VISA <input type="checkbox"/> MasterCard		
CARD NUMBER	SECURITY CODE	
SIGNATURE	EXP. DATE	
TOTAL DUE \$25.00	\$ PAYMENT AMOUNT	NRA ID # 100U
For Online Payments visit www.nationalrecovery.com		

MAKE PAYMENT AND REMIT TO:


NATIONAL RECOVERY AGENCY
PO Box 67015
Harrisburg, PA 17106-7015

Self-Addressed stamped envelope is required for return receipts.

Case# 2015-01734-0 Received at Luzerne County Prothonotary on 02/19/2015 9:58 AM, Fee = \$152.00

CALIFORNIA RESIDENTS

The state Rosenthal Fair Debt Collection Practices Act and the Federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. Non Profit Counseling services may be available in your area.

CALIFORNIA AND UTAH RESIDENTS:

As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. But we will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the first notice you received from us.

COLORADO RESIDENTS

FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA. A CONSUMER HAS THE RIGHT TO REQUEST IN WRITING THAT A DEBT COLLECTOR OR COLLECTION AGENCY CEASE FURTHER COMMUNICATION WITH THE CONSUMER. A WRITTEN REQUEST TO CEASE COMMUNICATION WILL NOT PROHIBIT THE DEBT COLLECTOR OR COLLECTION AGENCY FROM TAKING ANY OTHER ACTION AUTHORIZED BY LAW TO COLLECT THE DEBT. YOU MAY CONTACT OUR OFFICE AT; ASSOCIATED COLLECTION AGENCIES INC., 27 NORTH WILLERUP, SUITE B, MONTROSE, CO 81401 OR BY TELEPHONE AT 970-249-7514.

MASSACHUSETTS RESIDENTS:

MASSACHUSETTS RESIDENTS MAY CONTACT OUR OFFICE BY TELEPHONE AT THE NUMBER, OFFICE HOURS, AND ADDRESS LISTED ON THE FRONT OF THIS NOTICE OR TO 155 FEDERAL STREET, SUITE 700, BOSTON, MA 02110.

NOTICE OF IMPORTANT RIGHTS

YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE COLLECTION AGENCY.

MINNESOTA MEDICAL PATIENTS ONLY:

This collection agency is licensed by the Minnesota Department of Commerce. If you feel that your concerns have not been addressed, please contact National Recovery Agency and allow us the opportunity to try and address your concerns. Or, you have the option to address any concerns with the Minnesota Attorney General's Office, which can be reached at 651-296-3353 or 1-800-657-3787.

NEVADA HOSPITAL PATIENTS:

If the debtor pays or agrees to pay the debt or any portion of the debt, the payment or agreement to pay may be construed as: (1) An acknowledgement of the debt by the debtor, and (2) A waiver by the debtor of any applicable statute of limitations set forth in NRS 11.190 that otherwise precludes the collection of the debt. If the debtor does not understand or has questions concerning his legal rights or obligations relating to the debt, the debtor should seek legal advice. As used in this section, "hospital" has the meaning ascribed to it in NRA 449.012.

NEW YORK CITY RESIDENTS:

New York City Department of Consumer Affairs License number: 1239906

NORTH CAROLINA RESIDENTS:

NC Permit Number: 4485

TENNESSEE RESIDENTS:

This collection agency is licensed by the collection service board of TN Department of Commerce and Insurance, permit number 812.

MEDICAL PATIENTS PLEASE COMPLETE THE INFORMATION BELOW

OR

SEND FRONT/BACK COPY OF INSURANCE CARD

Patient Name:	Date of Birth:	Primary Insurance Co: _____ Policy #: _____ Group #: _____ Address: _____ City: _____ State: _____ Zip: _____ Effective Date: _____
Guarantor's Name:	Date of Birth:	
Address: _____		
City: _____ State: _____ Zip: _____	Phone #: _____	
Policy Holder Name: _____		Secondary Insurance Co: _____ Policy #: _____ Group #: _____ Address: _____ City: _____ State: _____ Zip: _____ Effective Date: _____
Address: _____		
City: _____ State: _____ Zip: _____	Phone #: _____	

RECEIVED

Case# 2015-01734-0 Received at Luzerne County Prothonotary on 02/19/2015 9:58 AM, Fee \$152.00